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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER PORTIONS OF
JOINT SUBMISSION IN RESPONSE TO
DKT. 416 RE: STATUS OF DISCOVERY
DISPUTES SHOULD BE SEALED**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney
7 for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt.
8 423.

9 3. On February 25, 2022, Plaintiffs filed its Administrative Motion to Consider
10 Whether Portions of Joint Submission in Response to Dkt. 416 Re: Status of Discovery Disputes
11 Should be Sealed (Dkt. 423) (“Joint Submission”). On February 25, 2022, I received an unredacted
12 service copy of these documents.

13 4. I have reviewed the document that Plaintiffs seek to file under seal pursuant to Civil
14 Local Rule 79-5, unredacted versions of which have been filed at Docket Entry 423-1 (“Joint
15 Submission”). Based on my review, there is good cause to seal the information highlighted in the
16 Joint Submission and explained as follows:

Document Sought to be Sealed	Basis for Sealing Portion of Document
<p data-bbox="282 1255 743 1291">Joint Submission</p> <p data-bbox="282 1325 743 1360">PDF Pages 4-8, 13-14, 18, 22</p>	<p data-bbox="751 1255 1516 1927">The information requested to be sealed contains Google’s highly confidential and proprietary information, regarding highly sensitive features of Google’s internal systems and operations, including details related to internal projects, identifiers, cookies, data fields, and logs and their proprietary functionalities, internal investigations of features, and personal and private information related to a Google employee, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of</p>

cyber security threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

5. Google's request is narrowly tailored in order to protect its confidential and proprietary information and the private information of its employee. These redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored and limited to portions containing Google's highly-confidential or confidential information, Google requests that the highlighted portions of the Joint Submission redacted from any public version of the document.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in San Francisco, California on March 4, 2022.

DATED: March 4, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Jonathan Tse
Jonathan Tse

Attorney for Defendant